

**Comments on the Proposed Regulation Integrity Management Program for Gas Distribution Pipelines**DEPT. OF TRANSPORTATION  
DOCKETS**Docket No. PHMSA-RSPA-2004-19854**

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Columbia Utilities, City of Columbia is a publicly-owned natural gas utility serving 1200 customers in the state of Kentucky. As a natural gas utility we must comply with the pipeline safety regulations issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), therefore we are very interested in the proposed Distribution Integrity Management Program (DIMP) rule.

We are committed to operate and maintain our natural gas distribution system to protect public safety. Writing plans, submitting reports to the government and other administrative requirements of federal regulations take time and money that could be used to inspect and maintain the natural gas system. In writing the final rule, we urge PHMSA to minimize the amount of paperwork this rule will require. We support the comments of the American Public Gas Association (APGA).

PHMSA is proposing to require detailed reports about the cause of all failures on plastic pipe and components. We do not currently participate in the voluntary plastic pipe data collection program, although we do receive information from APGA when problems with certain plastic piping are identified. We urge PHMSA to keep this program voluntary so that we are not forced to devote more resources to filling out these reports. We want to continue to be told if safety problems are found with any products being used by other gas utilities but do not want to see the individual reports that other utilities are voluntarily submitting. We don't have the time to wade through all that data.

We have an operator qualification program, a drug and alcohol testing program and a damage prevention program. We have not had any accidents caused by our employees so we don't see any benefit in including in our integrity management plan a section on "Assuring Individual Performance." That would just be more paperwork. The existing rules are adequate to ensure our workers are qualified.

PHMSA is proposing to require us to keep track of every time an excavator damages one of our pipelines. Currently we keep track of damages when we have to fix a leak and we file this with our annual pipeline safety report. We support keeping the excavation damage reporting the way it is.

The rule would require us to forever keep records of

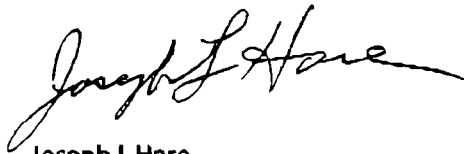
- Documents supporting threat identification;
- Written procedures for ranking the threats;
- Documents to support any decision, analysis, or process developed and used to implement and evaluate each element of the IM program;
- Records identifying changes made to the IM program, or its elements, including a description of the change and the reason it was made; and, for 10 years,
- Records on performance measures

These aren't records that would be of any value to us in operating and maintaining our system. There are already requirements to keep all our inspection and maintenance records. We think PHMSA should

keep the current recordkeeping periods for our inspection and maintenance records and not require us to document all the details of how we develop our IM plan.

We appreciate the opportunity to comment on this proposed rule.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Joseph L Hare". The signature is fluid and cursive, with a long horizontal stroke at the end.

Joseph L Hare

Gas Supervisor

Date: October 13, 2008